

December 18, 1991

Secretary
Federal Communications Commission
Washington, D.C. 20554

Dear Honorable Secretary:

This letter is in regard to the Commission's Notice of Proposed Rulemaking to Implement Advanced Television in the United States. As I understand it, the proposed ATV implementation plan would provide every existing full-power station with a second 6 MHz channel to permit broadcast of their ATV signal.

Unfortunately, this method of implementing ATV will displace many LPTV stations. In major markets, I would estimate that all LPTV stations will be displaced. Even minor markets like Corpus Christi, where I am an LPTV licensee, will experience some displacement, since currently every single channel is occupied by either a full-power station, an LPTV license, or an LPTV permit.

I believe this displacement would be a great dis-service to those viewers who depend on the programming provided by LPTV stations. In my particular case, I broadcast Telemundo Spanish-language programming to Corpus Christi viewers. Since Corpus Christi is 53% Hispanic, Spanish-language programming is very important to the viewers there. Displacement of the LPTV stations in Corpus Christi would deprive them of choice, leaving them only one Spanish-language station on the air, a full-power station. This lack of choice would subject them to a singular viewpoint and perspective on important issues, contravening one of the Commission's stated goals.

In order to alleviate some or all of the displacement associated with implementation of ATV, I would suggest the following:

- Implement ATV in such a manner that a separate 6 MHz channel is not required. I believe compression technology, or some of the proposed ATV systems, would permit this. This might implement ATV less efficiently than the current proposed method, but I believe serving all segments of the community, including those served by LPTV, is more important than achieving optimum efficiency in implementation of ATV.
- If the separate 6 MHz channel is required, do not initiate displacements until the full-power stations are ready to utilize the separate channel. I believe HDTV is years away from serious implementation, and delaying displacement as long as possible will permit LPTV stations to provide their beneficial service until the last possible moment.
- If a separate 6 MHz channel is required and displacement must be implemented, provide priority to the LPTV licensees, and displace first the LPTV permittees. Displacing unbuilt stations first will provide the maximum possibility for existing stations to continue serving their communities.

I strongly urge the Commission's serious consideration of these issues before implementing ATV.

Respectfully,


Keith L. Lowery
Owner, K66EB



KHR-TV 14

TELEMUNDO AFFILIATE

Tucson • Arizona

December 16, 1991

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M. Street, NW
Washington, D.C. 20554

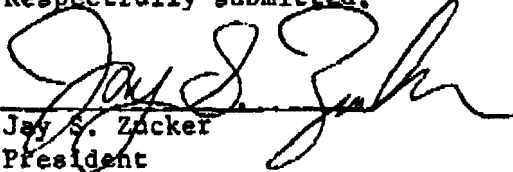
RE: Advanced Television
NPRM MM 87-268

Submitted herein are comments regarding the notice of proposed rulemaking
Docket 87-268.

If there are any further notices with respect to this matter, please send
correspondence to our station:

Hispanic Broadcasters
2828 North Country Club
Suite 110
Tucson, AZ 85716

Respectfully submitted,


Jay S. Zucker
President

cc: Bernard Carrey, Telemundo Group
Brian F. Fontes, FCC
Keith A. Larson, FCC
Martá L. Aguirre, Office of Senator McCain

Comments Regarding: Advanced Television
NPRM MM 87-268

K14HR is Tucson's only locally owned and operated television station. We service over 80,000 Hispanic households in the Nation's 18th largest Hispanic Community. According to the 1990 US Census our community hosts 25% Hispanic penetration. In Tucson, all local Spanish language television stations are exclusively LPTV:

K14HR, K43CW, K52OA

K14HR provides locally produce news, sponsors over 25 local events annually and donates more public service airtime than most full powers in our market. Community organizations have become dependent on K14HR as a source for public service productions in Spanish and English. As an LPTV we have experienced tremendous success. K14HR programming has been consistently shown respectful ratings in general market research.

Due to economic limitations, many minority programmed facilities are LPTV stations. The proposed rulemaking promotes the secondary status of LPTV; therefore, the Commission may be making a "secondary" statement to our Nation's Hispanic Communities.



TELEMUNDO TV GROUP
713 W. Yakima, Ave.
Yakima, WA 98902-3046
(509) 452-TV17

TO: The Secretary
Federal Communications Commission
Washington, D.C.

FM: Ron Bevins
Owner
K17CJ Yakima-Wapato, WA


RE: FCC PROPOSED RULEMAKING (ATV)

December 15, 1991

To The Secretary:

1. If forced off of the air by ATV, the Yakima, Washington ADI..indeed the entire state..will no longer have any local Spanish language television service. Because our market represents the largest concentration of Hispanics in Washington, the results of the loss of K17CJ should be self-evident:
 - a. Loss of the only local Spanish language TV station.
 - b. Loss of the only scheduled weekly locally-produced public affairs programming in Spanish.
 - c. Loss of the time K17CJ continues to give to public service/events coverage including live remote broadcasts of the area's biggest annual Hispanic events.
2. County permanent Hispanic population is now 1-in-4 persons. Those numbers nearly double with the impact of the seasonal Hispanic migrant work force. All indications are that the Hispanic population here will only continue to grow.
3. There is no reason to believe, at this time, that any of the local television stations have any interest in programming local Spanish language material.
4. It is unthinkable that the FCC would, with local Spanish language LPTV an accomplished fact, consider taking this and other similar stations off of the air to make room for ATV, as with the current proposed FCC Rulemaking for ATV.

Best regards,


Ron Bevins
Owner
K17CJ

Communicasting Corporation

11 West Melrose Street
Chevy Chase, MD 20815

December 20, 1991

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: ATV Rulemaking - MM Docket No. 87-268

Dear Ms. Searcy:

Communicasting Corporation, licensee of LPTV station W42AJ in Washington, D.C. strongly supports the Commission's initiative to enhance the audio and visual quality of current television broadcast services. As a television broadcaster in the Washington, D.C. area providing valuable services to the Hispanic community, we want to participate in such enhancements to improve our own ability to serve the Spanish speaking community in the Washington, D.C. area. When the opportunity is given to us to enhance our own transmission facilities, we plan to do so.

We are aware that the transition to a mass audience for ATV services will not happen over night and requires significant changes in the facilities and operations of existing broadcasters. We plan to cooperate in every way reasonably possible to support this transition process.

At the same time, we recognize that the Commission is faced with difficult problem because the number of available channels to permit existing broadcasters to conduct conventional television operations and simultaneously ATV broadcast operations could possibly result in the discontinuance of LPTV operations in the Washington, D.C. area. We request that the Commission establish as an important objective in these proceedings to preserve and protect existing LPTV operations from premature or unnecessary disruption or discontinuance of operations.

Grant of our request is urgently needed to preserve the unique Spanish-language programming service provided to Hispanic viewers by our LPTV station. The Telemundo network is an important

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resource of programming by and for Hispanic viewers, including the highly regarded Spanish language version of CNN news presented on the Telemundo network. In the Washington, D.C. area this programming meets important needs and interests of a large and growing Hispanic community. Attached are statistics indicating the dramatic growth over the past decade of the Hispanic population residing in the Washington, D.C. metropolitan area.

Our LPTV station is very important to the distribution of Hispanic programming service because despite our continuing efforts, most of the local cable television systems serving the area still refuse to carry our programming. There is simply no alternative for Hispanic viewers to obtain our unique programming in the event we are forced to go off-the-air.

In addition to Telemundo network programming, we carry significant public affairs, community affairs and public service programming originated at our local studios. We recently celebrated our third anniversary of local operations on December 3.

Our local programming includes weekly half hour public affairs talk show: "Washington Cafe" presented twice weekly covering local news topics featuring locally prominent journalists and community leaders. Another twice weekly public affairs program is "42 A Su Lado", a half hour public affairs program featuring discussions with community leaders regarding issues such as care and prevention of AIDS, immigration issues, access to medical services, housing issues, drunk driving and a broad range of other concerns of Hispanics in the Washington metropolitan area.

The station also presents many public service announcements for Hispanic community organizations and governmental organizations including the following:

- Adelante, Inc.
- Alianza
- Andromeda Hispano Mental Health Center
- Comite Pro-Ayuda A Ninos Y Ancianos De Costa Rica
- Asafunter
- Ayuda
- Central American Refugee Center
- Metropolitan Police
- Foundation For The Advancement Of Hispanic American Inc.
(FAHA)
- Hispanic American Festival of Washington
- Institute For Puerto Rican Affairs

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Office On Latino Affairs
Immigration And Naturalization Service
Spanish Speaking Community Of Maryland
Hispanos Unidos
Arlington County Department Of Employment
Comite Hispano De Virginia

This local programming and other public service commitments of our station are as important for the Hispanic community as the similar efforts of full service broadcasters.

The outreach of our station also includes participation in Hispanic cultural events including the Hispanic Festival held each July in downtown Washington, the Pan American Festival held each June in Alexandria, Virginia and a recently established ethnic festival held in October in Baltimore.


The Commission should also consider the economic losses which would result from the disruption of our existing services or possible termination of such services. The investment made in our station truly follows the small business model which the Commission in the past has praised as an "incubator" for developing minority participation in the broadcasting business and as an effective method encouraging innovative new program services. The administration, sales, program production and engineering personnel responsible for local operations are a gifted group of Hispanic men and women, including six full time employees and seven part time employees. They have been able to launch and sustain essential program services to the Hispanic community. We believe that the Commission has every reason to support the continued and expanded efforts of this gifted group of professionals by preserving and enhancing the LPTV operations of which they are such an important part.

We urge the Commission also to consider the enormous economic losses which our station would suffer by being forced off the air. If such a result is avoidable, the Commission should make every effort to prevent this from happening. We have entered into leases, have service agreements, have made substantial capital outlays for equipment, all of which would be lost if operations of this station were terminated. Particularly when this Commission has recently recognized in so many proceedings the importance of encouraging capital investment in new telecommunications operations, the public benefits from the preservation and enhancement of that investment by providing for continuation and possibly even enhancement of LPTV operations is self evident.

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In conclusion, we fully acknowledge the difficulty of the decisions which the Commission must make in this proceeding. We ask that the Commission make every effort to preserve the special public interest benefits for which the LPTV service was first created and which we have provided in our first three years of operation. We request only that that we be permitted to continue to make our valuable contribution to the needs and interests of the Hispanic community in the Washington, D.C. area.

Respectfully submitted,

A handwritten signature in cursive script, reading "Christopher S. Sargent". The signature is written in dark ink and is positioned above the printed name and title.

Christopher S. Sargent
President

HISPANIC POPULATION IN THE WASHINGTON AREA

| COUNTY OR CITY | HISPANIC POPULATION | PERCENT OF TOTAL COUNTY OR CITY POPULATION |
|-----------------|------------------------|--|
| District | 82,600 | 11.4 |
| Montgomery | 45,700 | 6.9 |
| Prince George's | 26,700 | 4.0 |
| Alexandria | 9,800 | 8.7 |
| Arlington | 19,400 | 10.8 |
| Fairfax | 42,900 | 6.2 |
| Falls Church | 300 | 3.4 |
| TOTAL | 227,400 | 7.4 |

SOURCES: U.S. Bureau of Census, Strategy Research Corp.,
Mayor's Office of Latino Affairs, County and Local Governments

NORTHERN VIRGINIA POPULATION, 1980 AND 1990

| Area | White | Black | Hispanic | Asian | Other | Total |
|---------------------------|-----------|-----------|----------|---------|--------|-----------|
| Alexandria | | | | | | |
| 1990 Total | 76,789 | 24,339 | 10,778 | 4,632 | 5,423 | 111,183 |
| Change From 1980 | 2.7% | 5.7% | 166% | 60% | 108% | 7.7% |
| Arlington County | | | | | | |
| 1990 Total | 130,873 | 17,940 | 23,089 | 11,560 | 10,563 | 170,936 |
| Change from 1980 | 3.7% | 27% | 160.5% | 74.3% | 81.5% | 12% |
| Fairfax County | | | | | | |
| 1990 Total | 665,399 | 63,325 | 51,874 | 69,338 | 20,522 | 818,584 |
| Change from 1980 | 25.7% | 80.9% | 165% | 205% | 108% | 37.1% |
| Fairfax City | | | | | | |
| 1990 Total | 16,830 | 966 | 1,159 | 1,409 | 417 | 19,622 |
| Change from 1980 | -7% | 65% | 206% | 194% | 84% | 1% |
| Falls Church | | | | | | |
| 1990 Total | 8,533 | 298 | 604 | 456 | 291 | 9,578 |
| Change from 1980 | -3.5% | 33% | 91% | 61.7% | 77% | 0.6% |
| Loudoun County | | | | | | |
| 1990 Total | 77,095 | 6,168 | 2,156 | 2,101 | 765 | 86,129 |
| Change from 1980 | 49.6% | 22.9% | 152.7% | 388.6% | 70% | 49.9% |
| Manassas City | | | | | | |
| 1990 Total | 23,332 | 2,889 | 1,601 | 867 | 869 | 27,957 |
| Change from 1980 | 70% | 105% | 725% | 398% | 595% | 81% |
| Manassas Park | | | | | | |
| 1990 Total | 5,941 | 490 | 314 | 169 | 134 | 6,734 |
| Change from 1980 | -3% | 71% | 224% | 525% | 83% | 3% |
| Pr. William County | | | | | | |
| 1990 Total | 179,709 | 25,078 | 9,662 | 6,569 | 4,330 | 215,686 |
| Change from 1980 | 39.4% | 110% | 195% | 215% | 146% | 49% |
| Statewide Total | | | | | | |
| 1990 Total | 4,791,739 | 1,162,994 | 160,288 | 159,053 | 73,572 | 6,187,358 |
| Change from 1980 | 13.3% | 15.3% | 100.7% | 140.2% | 74.6% | 15.7% |

NORTHERN VIRGINIA

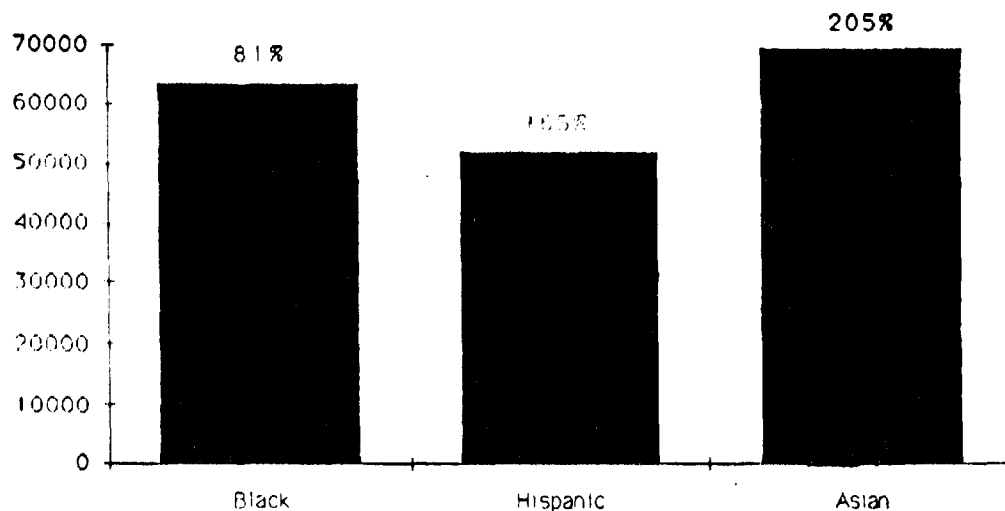
1980 Total: 1,105,709

1990 Total: 1,466,409

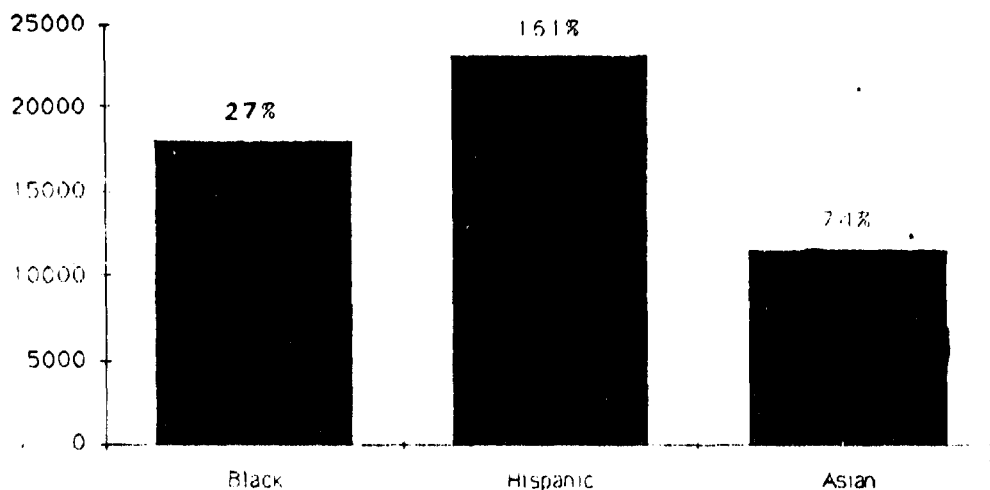
Census Figures Indicate Minorities Paced Population Growth in N.Va.

Racial Population and Percent Change from 1980

FAIRFAX COUNTY



ARLINGTON COUNTY



D.C. Became More Diverse In the 1980s

The District is a more racially mixed city than a decade ago, gaining thousands of Hispanics and whites even as it continued to lose black residents.

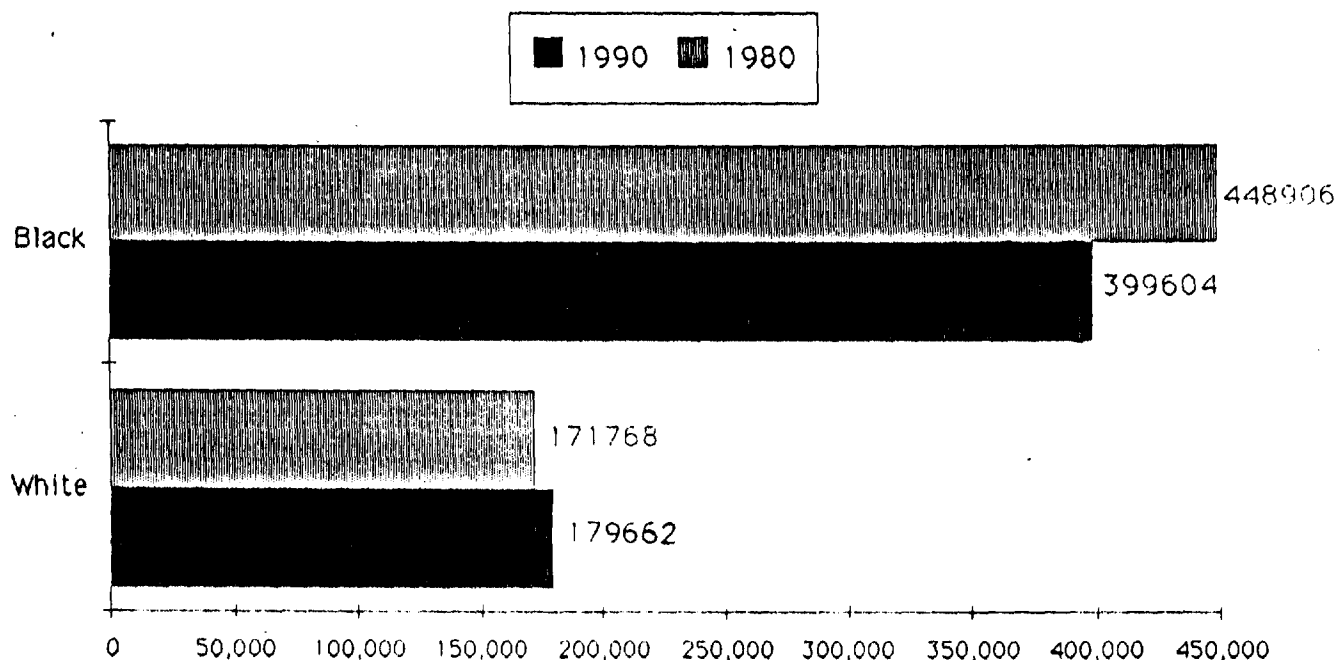
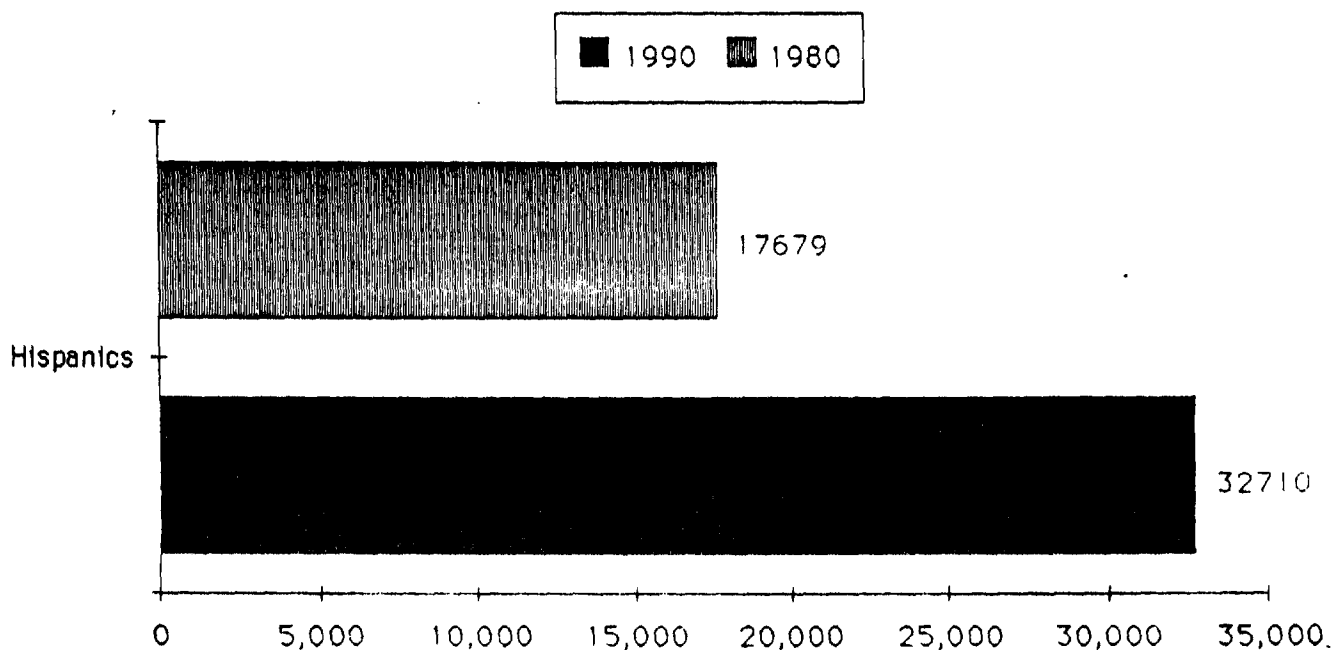


EXHIBIT 2

1992 HISPANIC HOUSEHOLD ESTIMATES*/

| <u>Rank</u> | <u>Market</u> |
|-------------|----------------------|
| 1 | Los Angeles |
| 2 | New York |
| 3 | Miami |
| 4 | San Francisco |
| 5 | Chicago |
| 6 | Houston |
| 7 | San Antonio |
| 8 | Brownsville/McAllen |
| 9 | Dallas |
| 10 | San Diego |
| 11 | El Paso |
| 12 | Fresno |
| 13 | Albuquerque/Santa Fe |
| 14 | Sacramento |
| 15 | Phoenix |
| 16 | Philadelphia |
| 17 | Denver |
| 18 | Corpus Christi |
| 19 | Boston |
| 20 | Washington |
| 21 | Tucson |
| 22 | Tampa |
| 23 | Austin |
| 24 | Salinas |
| 25 | Hartford |
| 26 | Orlando |
| 27 | Bakersfield |
| 28 | Laredo |
| 29 | Santa Barbara |
| 30 | Odessa-Midland |
| 31 | Lubbock |
| 32 | El Centro |
| 33 | Seattle-Tacoma |
| 34 | Colorado Springs |
| 35 | Salt Lake City |
| 36 | Las Vegas |
| 37 | Detroit |
| 38 | West Palm Beach |
| 39 | Portland |
| 40 | Waco |
| 41 | Palm Springs |
| 42 | Amarillo |
| 43 | Yakima |
| 44 | Atlanta |
| 45 | Milwaukee |
| 46 | Providence |
| 47 | Cleveland |
| 48 | New Orleans |
| 49 | Springfield |
| 50 | Kansas City |

*/ Based on information from Strategy Research Corporation,
January 1, 1992, Rankings of Hispanic Television Markets.